

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5**

IN THE MATTER OF:

Spectrulite Consortium, Inc.
1001 College Street
Madison, Illinois 62060

ATTENTION: Craig Rathgeb
Environmental Engineer

REQUEST TO PROVIDE INFORMATION PURSUANT TO THE CLEAN AIR ACT

The United States Environmental Protection Agency (U.S. EPA), by Richard C. Karl, Acting Director of the Air and Radiation Division, Region 5, hereby requires Spectrulite Consortium, Inc. (Spectrulite) to submit certain information pertaining to its facility at 1001 College Street, Madison, Illinois, pursuant to Section 114(a) the Clean Air Act (Act), 42 U.S.C. § 7414(a), (herein after referred to as Section 114(a)). Section 114(a) authorizes the Administrator of U.S. EPA to require the submittal of such information. Authority to require the submittal of information pursuant to Section 114(a) has been delegated by the Administrator to the Director of the Air and Radiation Division, Region 5. The information to be submitted in response to this request is specified in Appendix A.

Spectrulite is the owner or operator of an emission source as specified in Section 114(a). The information sought by this request is necessary for U.S. EPA to determine whether Spectrulite is in compliance with applicable provisions of the Illinois State Implementation Plan, as approved by the Administrator of U.S. EPA pursuant to Section 110 of the Act, 42 U.S.C. § 7410.

The information specified in Appendix A of this request must be submitted according to the schedule specified in Appendix A. All information submitted in response to this request must be certified as true, correct, accurate, and complete by an individual with sufficient knowledge and authority to make such certification on behalf of Spectrulite. All required information should be sent to:

Attn: Compliance Tracker, (AE-17J)
Air Enforcement and Compliance Assurance Branch
U.S. Environmental Protection Agency
Region 5
77 West Jackson Boulevard
Chicago, Illinois 60604

With copies to the Illinois Environmental Protection Agency (IEPA):

David Kolaz, Chief
Compliance and Systems Management Section
Bureau of Air
Illinois Environmental Protection Agency
1021 North Grand Avenue East
Springfield, Illinois 62702

John Justice, Manager
Region III
Illinois Environmental Protection Agency
2009 Mall Street
Collinsville, Illinois 62234

Failure to fully comply with the terms of this request for information may subject Spectrulite to an enforcement action pursuant to Section 113 of the Act, 42 U.S.C. § 7413.

Pursuant to 40 C.F.R. Part 2, Subpart B, Spectrulite may be entitled to assert a claim of business confidentiality regarding any portion of the information submitted in response to this request, except emission data, as defined at 40 C.F.R. § 2.301(a)(2). Failure to assert a claim of business

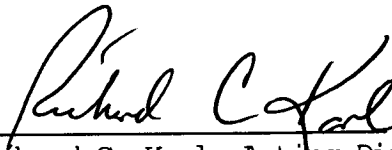
confidentiality renders all submitted information, which is subject to a claim of business confidentiality, available to the public to the extent provided in 40 C.F.R. Part 2, Subpart B.

Any information submitted in response to this request may be used by U.S. EPA in support of an administrative, civil, or criminal action against Spectrulite. Knowing submittal of false information to U.S. EPA, in response to this request, may be actionable under Section 113(c)(2) of the Act, as well as 18 U.S.C. § 1001, and 18 U.S.C. § 1341.

This request is not subject to the Paperwork Reduction Act of 1980, 44 U.S.C. § 3501 et seq., because it seeks collection of information by an agency from specific individuals or entities as part of an administrative action or investigation.

Any questions concerning this request for information should be directed to Bonnie Bush at (312) 353-6684.

2-11-99
Date


Richard C. Karl, Acting Director
Air and Radiation Division

APPENDIX A

The following information must be supplied in accordance with the foregoing Request for Information Pursuant to the Clean Air Act within thirty (30) days of receipt of this request.

1. Provide the complete name, location (including county) and mailing address of plant.
2. Provide the complete name(s), address(es), and telephone number(s) of the plant manager/contact.
3. List and describe all sources of particulate emissions to air at the plant, including how the particulates are emitted (e.g., through a stack, a vent, or as fugitive emissions).
4. For each source identified in response to paragraph 3 above, describe any air pollution equipment in place, the date it was installed and the control equipment design efficiency. Provide a brief description of all routine maintenance performed on the control device(s), including frequency of each task.
5. Provide process diagrams depicting all air emission points listed in response to paragraph 3 above and all air pollution control devices describe in response to paragraph 4 above.
6. For each air emission source listed in response to paragraph 3, provide a copy of each performance test, stack test, and visible emissions test performed since January 1, 1996 to determine compliance with any applicable air regulations. If a performance, stack, or visible emissions test has been conducted, but not for the purpose of determining compliance with an applicable regulation, provide a copy of the most recent test results.
7. For each air emission source listed in response to paragraph 3 for which a stack test has not been conducted since January 1, 1996, and which is subject to a mass emission limit, Spectrulite shall conduct particulate emission stack testing and opacity testing as specified below. The testing shall be conducted in accordance with the U.S. EPA Methods 1-4 and Method 5 for particulate matter, and Method 9 for opacity. These Methods are found at 40 C.F.R. Part 60, Appendix A.
 - a. Each test shall consist of three test runs during which the source is operating at its maximum design capability. If maximum design capability is not achieved during testing, a written explanation shall be provided describing the reason therefore.

- b. Testing shall be performed under conditions representative of the maximum particulate emissions potential (e.g., highest ash content coal for a boiler, dirtiest quality scrap for a secondary smelter).
- c. Source operating rates and parameters (e.g., boiler steam flow) and particulate control equipment parameters (e.g., scrubber pressure drop or electrostatic precipitator voltage and current) shall be recorded.
- d. The stack test specified above shall be conducted under a test protocol approved by U.S. EPA. The stack test protocol shall be submitted to the U.S. EPA within 30 days of receipt of this request. This protocol shall include the maximum capability at which the source will be operated and describe conditions representative of maximum particulate emissions potential.
- e. Stack testing shall commence within 45 days of receipt of this request. Spectrulite shall notify the U.S. EPA and IEPA of the stack test date at least 15 days prior to the stack test. Personnel designated by the agencies shall be permitted to observe all testing, ask questions of testing personnel, and to make whatever records, including photographs and tape recordings (upon notification), as deemed necessary by the agency personnel.
- f. Visible emission observations shall be conducted in accordance with U.S. EPA Method 9, 40 C.F.R. Part 60, Appendix A, throughout each test run.
- g. Only routine control device maintenance may be performed between the date that this request is received, and the date of the stack test.
- h. The results of all emission testing shall be submitted in a bound report to the U.S. EPA and the IEPA within 30 days after completion of the testing. The report shall contain the results of the testing (including raw data sheets and all filter and beaker weights), the reporting of all applicable operating parameters identified in paragraphs 7.b. and 7.c., above, as well as information required in paragraph 7.f. above. Copies of any continuous opacity monitoring data (if applicable), for the period of testing, shall also be submitted.